EXHIBIT C

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JEANIE HICKS	§	
Plaintiff,	§	
	§	
V.	§ CIVIL ACTION NO. 4:	20-cv-1661
	§	
CENLAR FSB,	§	
Defendants.	§	

ATTORNEY'S FEE DECLARATION

STATE OF TEXAS
COUNTY OF COLLIN

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following statements are true and correct:

- 1. "My name is Crystal Gee Gibson. I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.
- 2. I am a licensed attorney practicing in Texas. I handle cases in Harris County and counties throughout Texas. I am familiar with the reasonable attorney's fees for cases involving excess proceeds and suits of this nature and a reasonable attorney fee in this matter would be \$5,117.00 for prosecution of this matter to Judgment, plus costs in the amount of \$406.68. This amount is both reasonable in nature and necessary as a result of the litigation. This number represents actual attorneys' fees at the billable hour rate of \$215.00 per hour, which were incurred by Defendant through the course of this litigation. Defendant incurred these fees in all or in part by the following acts taken by its attorneys:
- 3. In connection with this lawsuit, I have spent time conferring and reviewing relevant documents, researching the property records, reviewing prior litigation and foreclosure history since 2009, drafting the answer, affirmative defenses and counterclaim, drafting removal documents, preparing a joint case management plan, attending a Rule 26(f) conference, drafting Rule 26

Disclosures, drafting Rule 26 Expert Designations, and drafting Defendants' Motion for Summary Judgment and client affidavit as well as attendance at status conferences. I have currently expended 23.8 hours of time and expect to expend approximately 2 more hours on reviewing and reply to Plaintiff's MSJ response which totals 25.8 hours through the conclusion of this lawsuit. Defendant has also incurred costs in the amount of \$406.68.

4. The Texas Civil Practices and Remedies Code §38.001 et. seq. provides for fair, usual, reasonable, and customary attorneys' fees in this matter. Reasonable attorney's fees and costs through the conclusion of this mater are \$5523.68.

Crystal Gee Gibson
Date: May 5, 2021

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